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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION  
JUN 15 PM 12 31  
CLERK  
U.S. DISTRICT COURT

BALLY MANUFACTURING CORPORATION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
D. GOTTLIEB & CO. and )  
WILLIAMS ELECTRONICS, INC., )  
 )  
Defendant. )

CIVIL ACTION NO. 78 C 2246

DEFENDANT'S FIRST INTERROGATORY  
TO PLAINTIFF

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Defendant, Williams Electronics, Inc., requires plaintiff, Bally Manufacturing Corporation and its subsidiaries (hereinafter Bally), to answer under oath the following interrogatory in accordance with the provisions of Rule 33 of the Federal Rules of Civil Procedure.

Definition of Terms

A. In the following interrogatories, "plaintiff" means the plaintiff herein, Bally Manufacturing Corporation and its subsidiaries, and this term is meant to include all officers, directors, managing agents, employees (to the extent of their activities relating to the business affairs of plaintiff), and attorneys associated with said corporations, and all other persons representing and under the control of the plaintiff in this action.

B. As used herein, "person" is used in its broadest sense to include, whenever the context permits, firms, partnerships, corporations and other business organizations as well as individuals. When asked to "identify" persons, plaintiff is requested to describe each person with the certainty required for a notice of examination for deposition under Rule 30 including but not limited to the person's name and address, and in the case of a natural person, his full name, home address, business address, title, present occupation and employer.

#### Introduction

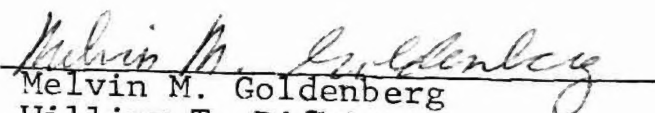
Attached to this interrogatory is detailed information regarding the processor controlled pinball games manufactured and sold by defendant Williams Electronics, Inc. This information is supplied to permit plaintiff to respond to the following interrogatory.

INTERROGATORY NO. 1. With regard to the patent in suit:

- (A) identify each and every claim thereof which plaintiff alleges is infringed by the Williams processor controlled pinball games;
- (B) apply each claim allegedly infringed, element by element, to the Williams processor controlled pinball game, specifically referring to the circuit components (as shown in the material submitted herewith or such other material as may be available

to plaintiff) which correspond to each claim element;

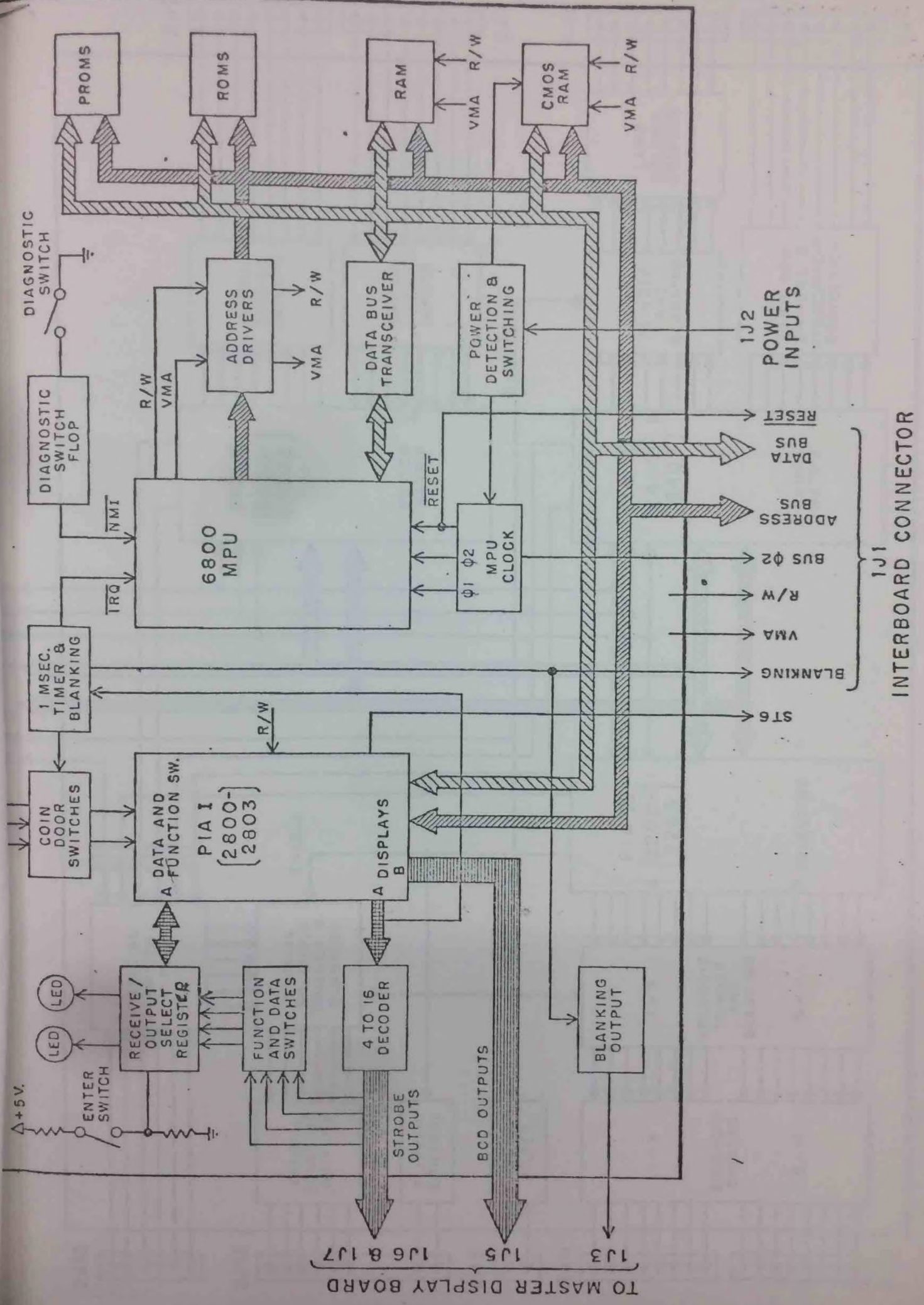
- (C) identify all persons who in any way participated in supplying the answers to this interrogatory and indicate the contribution of such person in supplying these answers;
- (D) identify all persons who are available to testify as to the subject matter of this interrogatory;
- (E) identify all documents relating to the subject matter of this interrogatory.

  
Melvin M. Goldenberg  
William T. Rifkin  
McDougall, Hersh & Scott  
135 S. LaSalle Street  
Chicago, Illinois 60603  
(312) 346-0338  
Firm ID No. 323

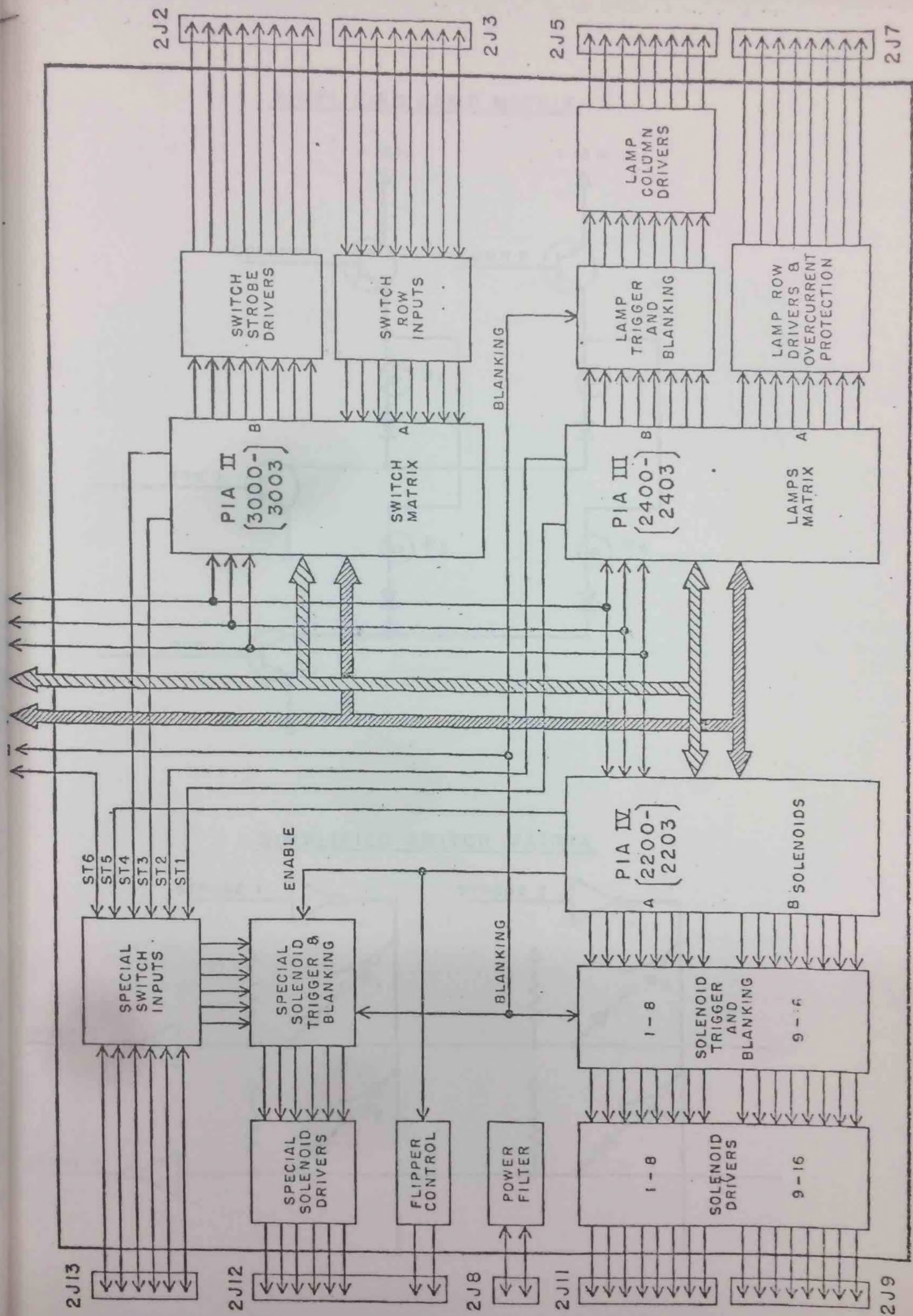
Attorneys for Defendant  
Williams Electronics, Inc.

November 14, 1978



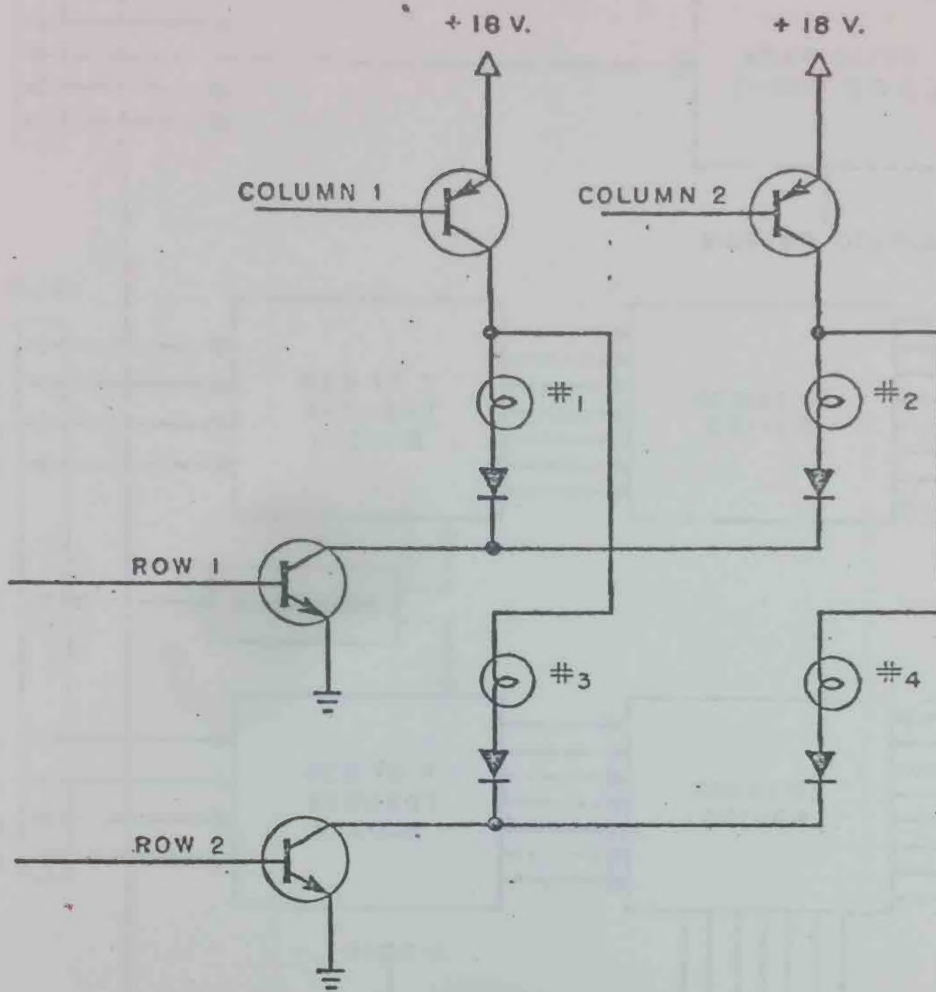




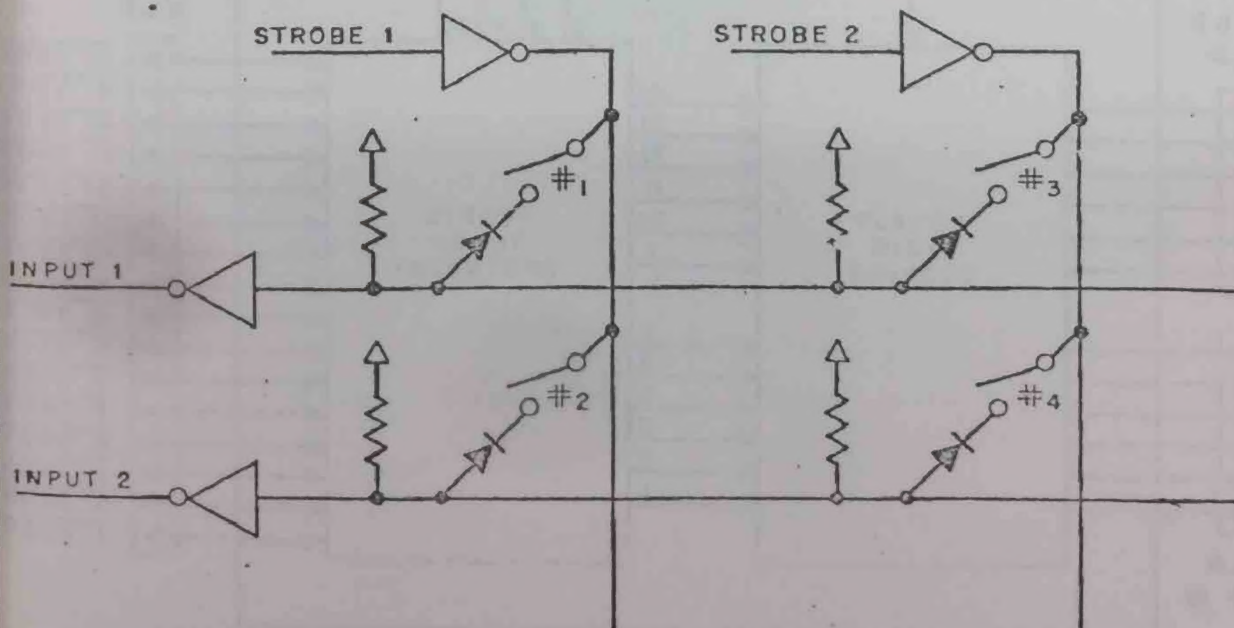




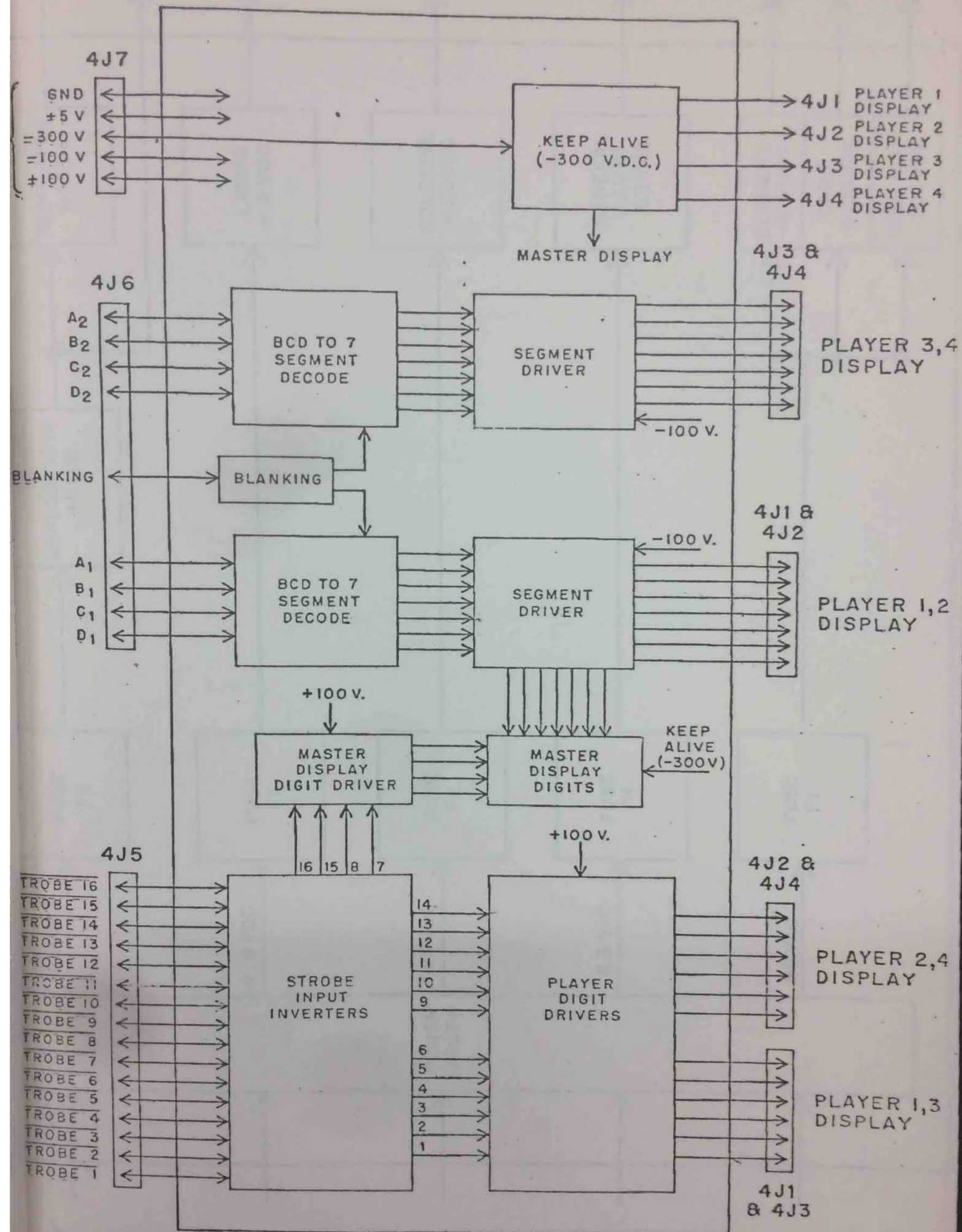
### SIMPLIFIED LAMP MATRIX



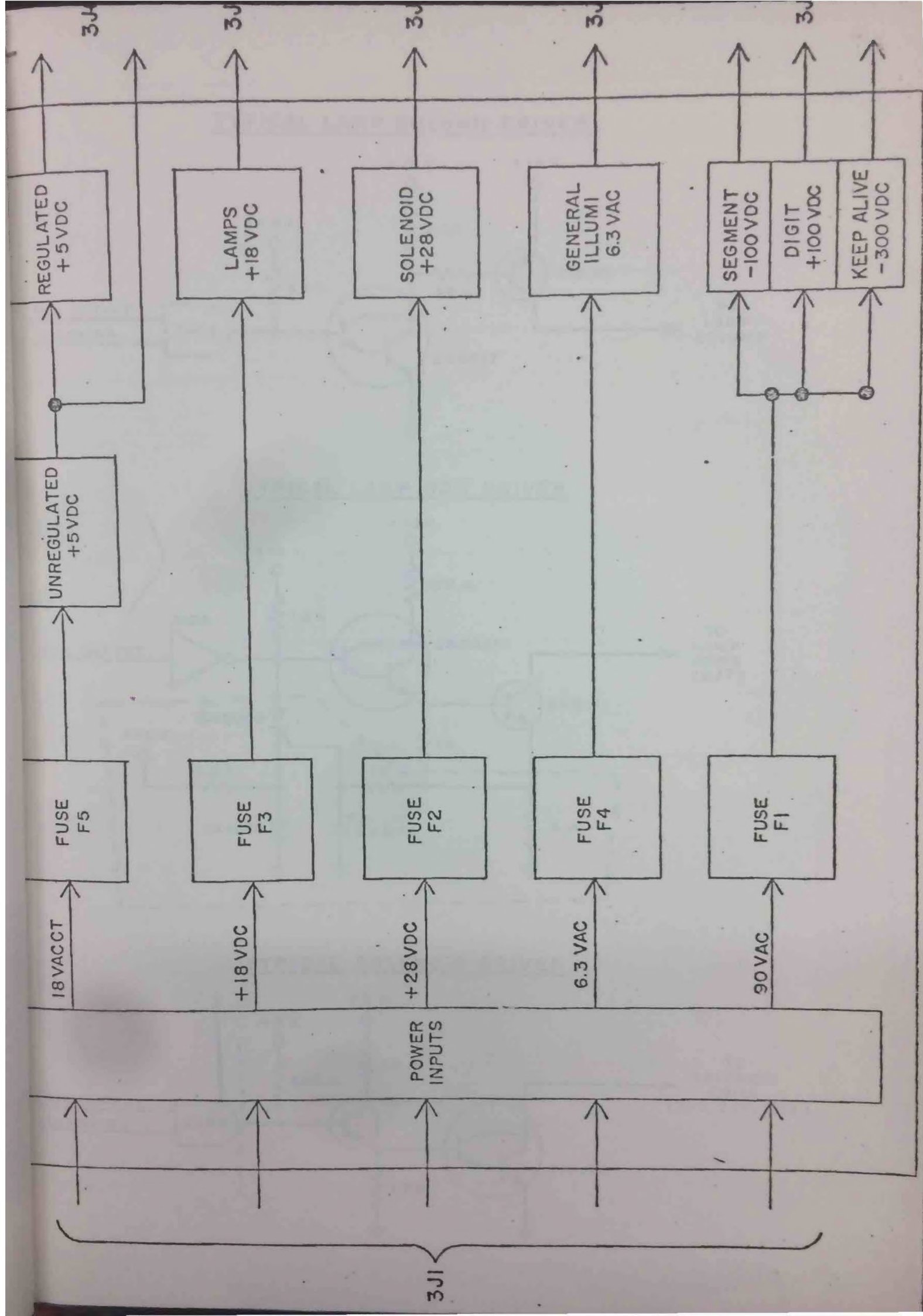
### SIMPLIFIED SWITCH MATRIX



# MASTER DISPLAY BLOCK DIAGRAM

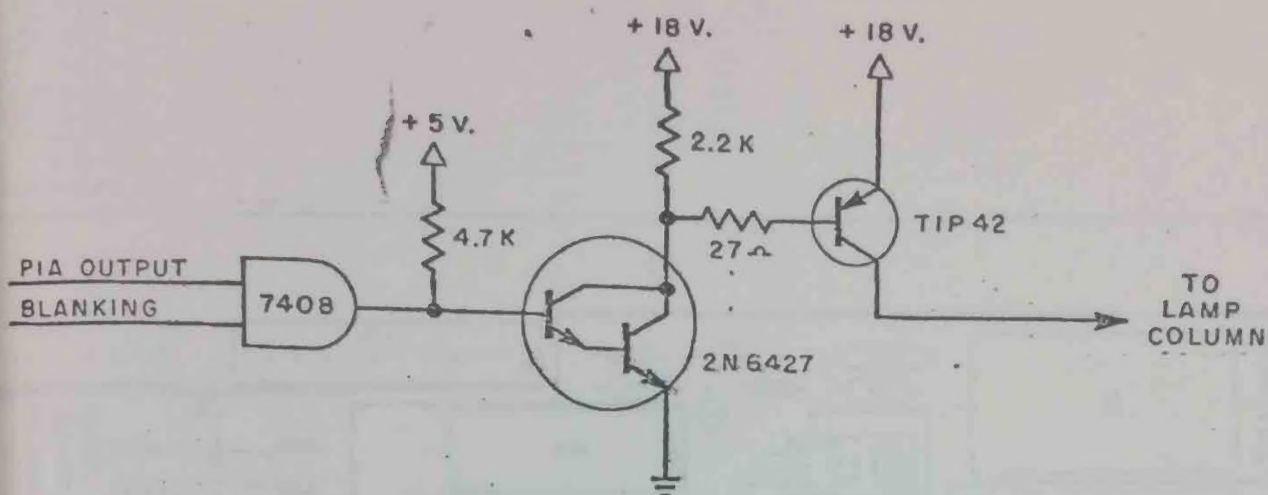




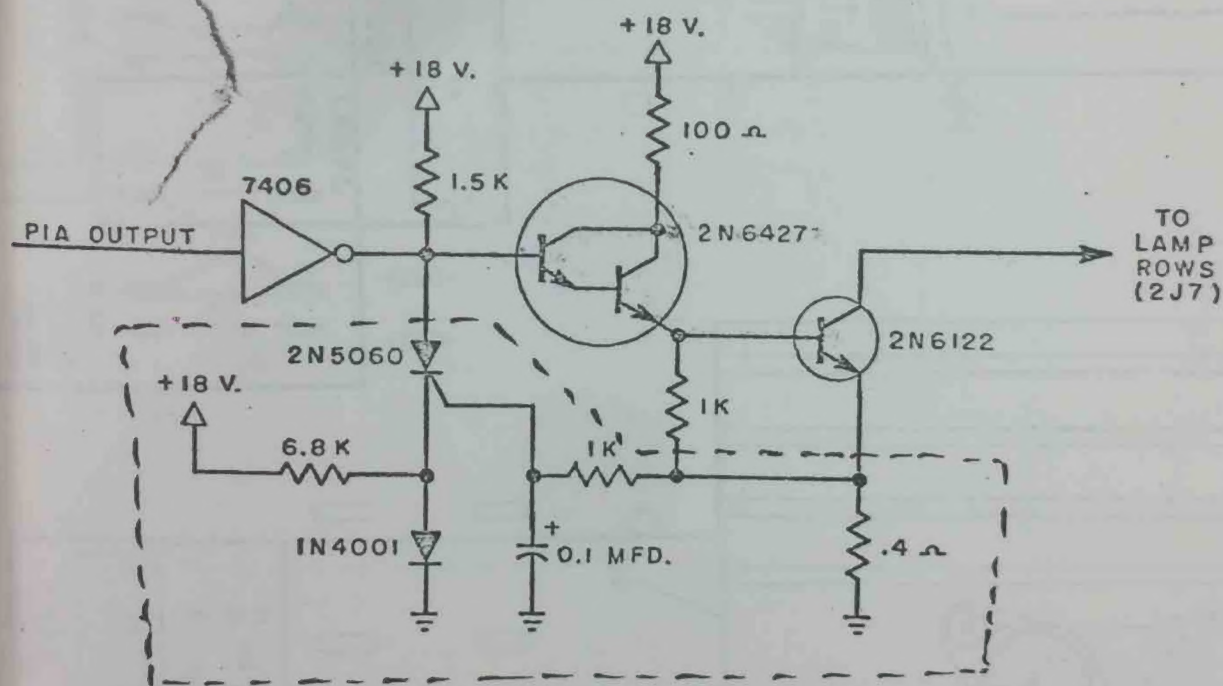




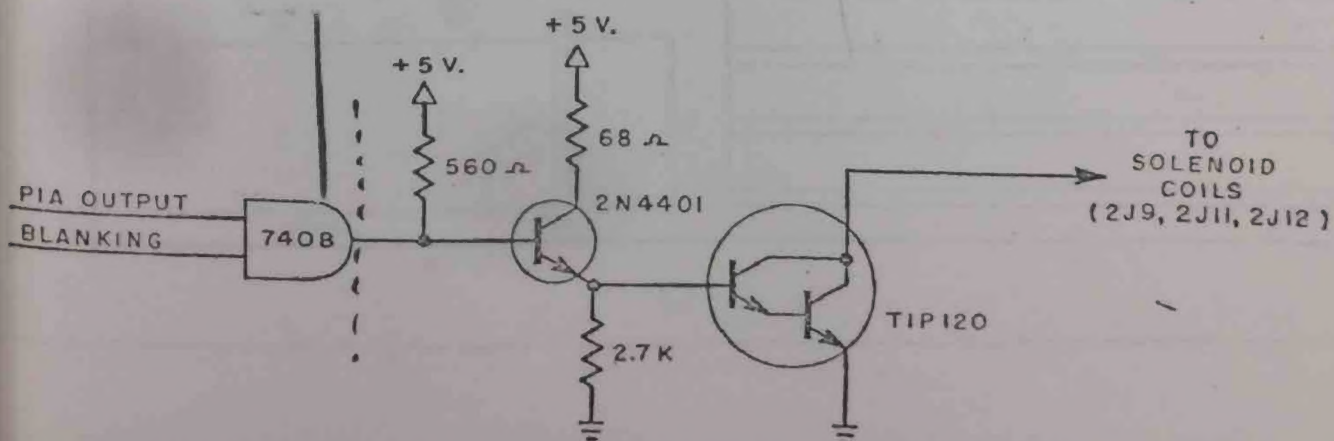
### TYPICAL LAMP COLUMN DRIVER



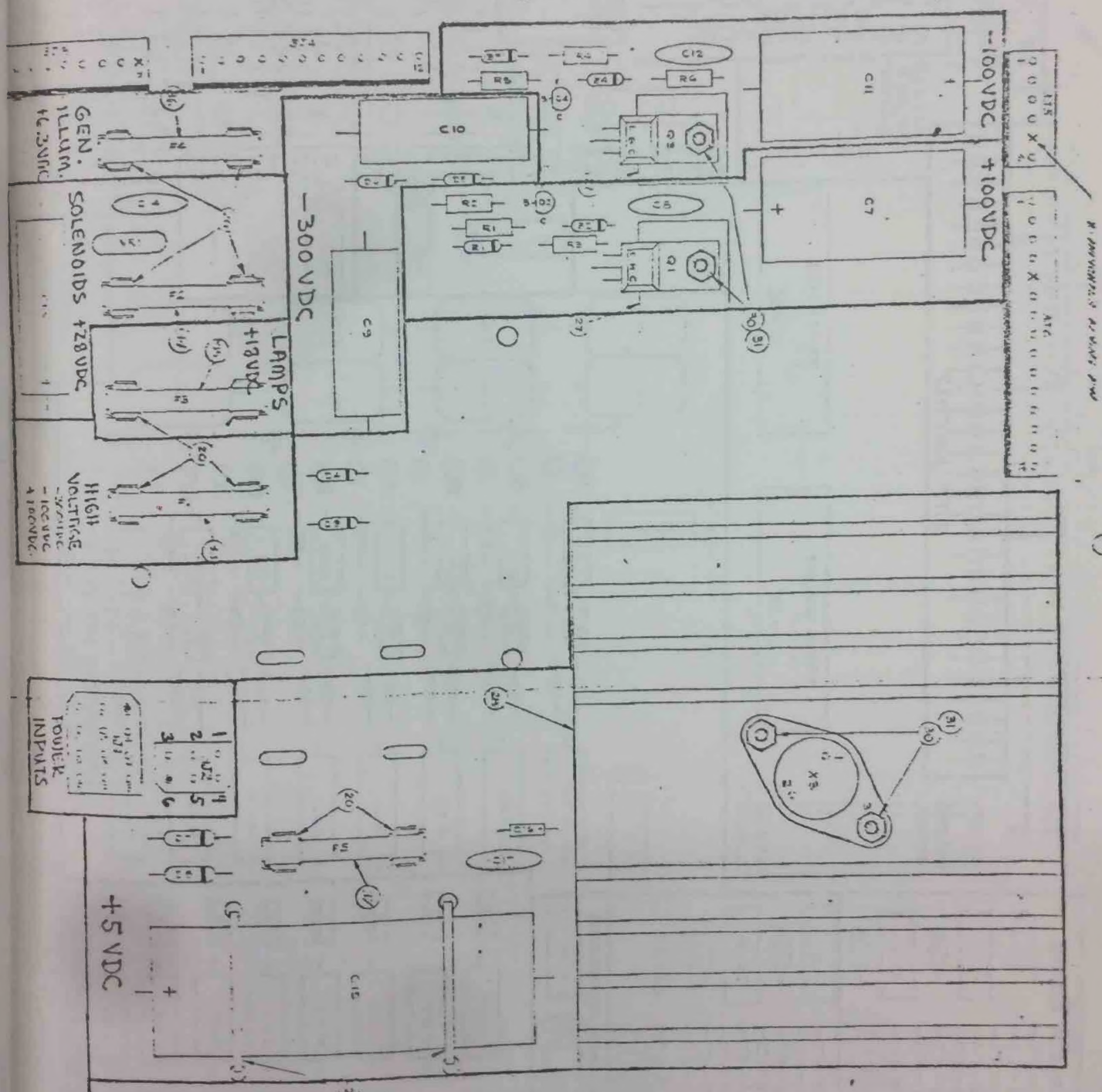
### TYPICAL LAMP ROW DRIVER



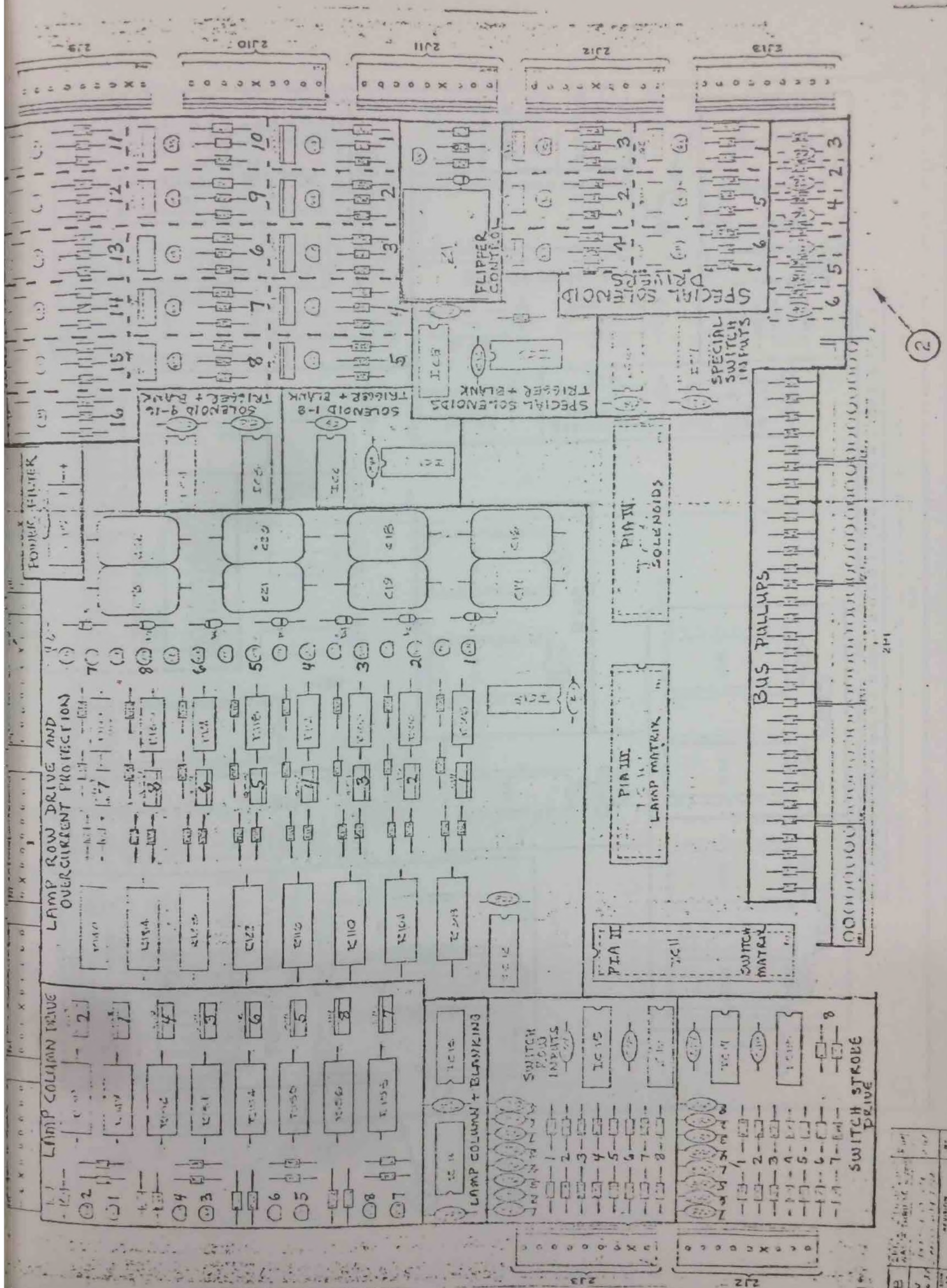
### TYPICAL SOLENOID DRIVER











REV	DATE	BY
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98	10/1/74	J. J. J.
99	10/1/74	J. J. J.
100	10/1/74	J. J. J.







4 ma @ 500 Hz

# LIST OF MATERIAL

QTY	ITEM NO.	DESCRIPTION
1	IC1	74-100, 100V
1	IC2	74-100, 100V
1	IC3	74-100, 100V
1	IC4	74-100, 100V
1	IC5	74-100, 100V
1	IC6	74-100, 100V
1	IC7	74-100, 100V
1	IC8	74-100, 100V
1	IC9	74-100, 100V
1	IC10	74-100, 100V
1	IC11	74-100, 100V
1	IC12	74-100, 100V
1	IC13	74-100, 100V
1	IC14	74-100, 100V
1	IC15	74-100, 100V
1	IC16	74-100, 100V
1	IC17	74-100, 100V
1	IC18	74-100, 100V
1	IC19	74-100, 100V
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1	IC24	74-100, 100V
1	IC25	74-100, 100V
1	IC26	74-100, 100V
1	IC27	74-100, 100V
1	IC28	74-100, 100V
1	IC29	74-100, 100V
1	IC30	74-100, 100V
1	IC31	74-100, 100V
1	IC32	74-100, 100V
1	IC33	74-100, 100V
1	IC34	74-100, 100V
1	IC35	74-100, 100V
1	IC36	74-100, 100V
1	IC37	74-100, 100V
1	IC38	74-100, 100V
1	IC39	74-100, 100V
1	IC40	74-100, 100V
1	IC41	74-100, 100V
1	IC42	74-100, 100V
1	IC43	74-100, 100V
1	IC44	74-100, 100V
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1	IC67	74-100, 100V
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1	IC69	74-100, 100V
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1	IC97	74-100, 100V
1	IC98	74-100, 100V
1	IC99	74-100, 100V
1	IC100	74-100, 100V

NOTE: 1. ALL COMPONENTS ARE TO BE MOUNTED ON A SINGLE-ENDED STRIP BOARD. 2. ALL COMPONENTS ARE TO BE MOUNTED ON THE SAME SIDE OF THE BOARD. 3. ALL COMPONENTS ARE TO BE MOUNTED ON THE BOARD IN THE ORDER SHOWN IN THE LIST OF MATERIAL. 4. ALL COMPONENTS ARE TO BE MOUNTED ON THE BOARD IN THE ORDER SHOWN IN THE LIST OF MATERIAL.

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